ARGUIMBAU & CO.

ESTABLISHED 1890

4 Davenport Avenue
P.O. Box 632
Greenwich, CT
06836-0632 U.S.A.

TEL: (203) 661-7080
FAX: (203) 661-6019
TELEX: 996454

December 8, 2004

Chere L. Shorter,
Standardization Section, Processed Products Branch,
Fruit and Vegetable Programs, Agricultural Marketing Service,
U.S. Department of Agriculture
1400 Independence Avenue SW., Room 0709, South Building; STOP 0247,
Washington, DC 20250

Re: Comments Standards for Grades of Olive Oil [Docket No. FV-04-334]
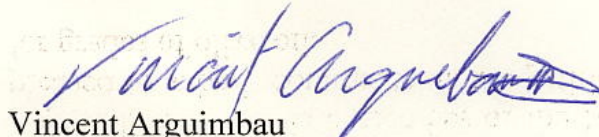
Dear Ms. Shorter:

Arguimbau & Co. is a member of the North American Olive Oil Association and is pleased to submit comments on the petition filed regarding the United States standards for grades of olive oil.

Though the NAOOA's testing results show consumers can be confident what they buy in supermarkets is correctly labeled, the lack of an up-to-date standard creates the opportunity for unscrupulous companies to produce or sell inferior product. We support updating the standard to eliminate that opportunity.

In its cover note accompanying the petition, the California Olive Oil Council mentions it has deleted any reference to a value for linolenic acid, pending the results of a review of the correct fatty acid limits for linolenic acid. We support the exclusion of a reference to linolenic acid, provided the standard will be updated immediately upon completion of the study.

With regard to the organoleptic testing requirements, in order to ensure integrity, we would request USDA create a panel of USDA employees that would be certified by the IOOC to perform organoleptic analyses. For the chemical testing, we request USDA create a lab or accredit one or more labs that would perform the analyses following IOOC technical standards. It would be necessary in both chemical and organoleptic testing to use coded samples as opposed to product labeled with brand names to avoid any claims of bias.

Sincerely

Vincent Arguimbau
President

Agents for Mediterranean Specialty Food Exporters